



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 2526

DATE SCANNED 12/10/12

SCANNER NO. 2

SCAN OPERATOR EES

12092681536



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2012 JUN 22 P 1:04

June 22, 2012

SENSITIVE

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Patrieia Carmona *PC*
Chief Compliance Officer

DC Debbie Chacona
Assistant Staff Director
Reports Analysis Division

BY: *JW* Jodi Winship/Sari Pickeral *DP*
Compliance Branch

SUBJECT: Reason To Believe Recommendation – 2012 12 Day Pre-Primary
Report (Texas)

Attached is a list of a political committees and their treasurers who failed to file or timely file the 2012 12 Day Pre-Primary Report for the Texas Primary Election in accordance with 2 U.S.C. § 434(a). The 12 Day Pre-Primary Report was due on May 17, 2012 and the Primary Election was held on May 29, 2012.

The committees listed on the attached RTB Circulation Report either failed to file or failed to file timely the election sensitive report by the required due date. Election sensitive reports filed more than four days prior to the election are considered late and reports not filed more than four days prior to the election are considered not filed. In accordance with the schedule of civil money penalties for reports at 11 CFR § 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

Recommendation

1. Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Report violated 2 U.S.C. § 434(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
2. Send the appropriate letters.

12092681537

Federal Election Commission
Reason to Believe Circulation Report
2012 PRE-PRIMARY Election Sensitive 05/17/2012 AUTH (TX)

| AF# | Committee ID | Committee Name | Candidate Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty |
|------|--------------|-----------------------------|-----------------|--------------------|-----------|----|--------------|-----------|----------|-------------|
| 2526 | C00495937 | ITAMAR GELBMAN FOR CONGRESS | GELBMAN, ITAMAR | ITAMAR GELBMAN | \$192,145 | 0 | | Not Filed | \$36,429 | \$1,400 |
| 2527 | C00506311 | KIM MORRELL FOR CONGRESS | MORRELL, KIM | ROBERT J. LLORENTE | \$120,513 | 0 | 5/25/2012 | Not Filed | \$36,682 | \$1,400 |

12092681539

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Reason To Believe Recommendation 2012)
12 Day Pre-Primary Report (TX):)
ITAMAR GELBMAN FOR CONGRESS,) AF# 2526
and ITAMAR GELBMAN as treasurer;)
KIM MORRELL FOR CONGRESS, and) AF# 2527
ROBERT J LLORENTE as treasurer;)

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on June 25, 2012 the Commission took the following actions on the Reason To Believe Recommendation 2012 12 Day Pre-Primary Report (TX) as recommended in the Reports Analysis Division's Memorandum dated June 22, 2012, on the following committees:

AF#2526 Decided by a vote of 6-0 to: (1) find reason to believe that ITAMAR GELBMAN FOR CONGRESS, and ITAMAR GELBMAN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2527 Decided by a vote of 6-0 to: (1) find reason to believe that KIM MORRELL FOR CONGRESS, and ROBERT J LLORENTE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would

be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

June 26, 2012
Date

Shawn Woodhead Werth
Shawn Woodhead Werth
Secretary and Clerk of the Commission

12092681540



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 26, 2012

Itamar Gelbman, in official capacity as Treasurer
Itamar Gelbman for Congress
P.O. Box 832
Joshua, TX 76058

C00495937
AF#: 2526

Dear Mr. Gelbman:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 12 Day Pre-Primary Report of Receipts and Disbursements in any calendar year during which there is a regularly scheduled election for which the candidate is seeking election or nomination for election. This report, covering the period through May 9, 2012 shall be filed no later than May 17, 2012. 2 U.S.C. 434(a). Records at the Commission indicate that this report was not filed prior to four (4) days before the election. You should file the report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 2 U.S.C. § 434(a). 2 U.S.C. § 437g(a)(4). On June 25, 2012, the FEC found that there is reason to believe ("RTB") that Itamar Gelbman for Congress and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) by failing to file timely this report on or before May 17, 2012. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$1,400. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. Your payment of \$1,400 is due within forty (40) days of the finding, or by August 4, 2012, and is based on these factors:

Sensitivity of Report: Election Sensitive
Level of Activity: \$36,429
Number of Days Late: Not Filed
Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found at the top of page 1 under your

committee's identification number, to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must be received within forty (40) days of the Commission's RTB finding, or August 4, 2012. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. district court under 2 U.S.C. § 437g. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Itamar Gelbman for Congress and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, send the enclosed remittance form, along with your payment, to the FEC at the address on page 4. Upon receipt of your payment, the FEC will send you a final determination letter.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) until it is placed on the public record in accordance with 11 CFR § 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Sari Pickarall in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Caroline C. Hunter
Chair

ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$1,400 for the 2012 Pre-Primary Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

Federal Election Commission
P.O. Box 979058
St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

The remittance and your payment are due by August 4, 2012. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Itamar Gelbman for Congress

FEC ID#: C00495937

AF#: 2526

PAYMENT DUE DATE: August 4, 2012

PAYMENT AMOUNT DUE: \$1,400



24 JUL '12 RCVD

FEC OFFICE OF
ADMIN REVIEW

Via USPS Certified Mail 7007 2560 0001 7476 7443

July 10th, 2012

RE: AF 2526

Dear Sir/Mam

On July 3rd I was contacted by one of your staff member regarding AF 2526 (Failure to file 12 day pre-primary report).

During the 12 days before the primary I tried to electronically file numerous amounts of times but was denied, a few days before the primary I was contacted by one of your staff member, she was extremely nice and seem to be very professional (I am sorry I don't recall the names, dates and times of this chain of events as I didn't realize I am doing something wrong), she explained that I missed the deadline, I explained her my situation that I am trying to electronically file and it just doesn't work, I even tried to do it while talking with her over the phone and it didn't work either.

She told me that I should just mail a printout overnight. I followed her instruction and I thought that's the end of it and that I have complied with the FEC rules. I wasn't aware I should also file it electronically until I was contacted by your office again on July 3rd.

After receiving the call from your office on July 3rd, I tried to file it again electronically and it worked, I also filed the June 30th report as well that same day.

As it was an honest mistake and misunderstanding on my end, I would like to request a forgiveness and waiver of the fine, I can assure you I will not repeat these mistakes again and I am now aware that all filing should be made electronically. I am 100% positive I will comply with all FEC rules and regulations. As a proof of my co-operating standing I gave your staff my personal cell phone number to put on file as it is the easiest way to get a hold of me.

As I lost the elections, I am now back to work. My job is very demanding and requires me to be on the road frequently, the best way to get a hold of me is through my cell phone

Yours truly,

A handwritten signature in black ink, appearing to read "Itamar Gelbman", written over the words "Yours truly,".
Itamar Gelbman

12092681545



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Via First Class Mail

July 24, 2012

Itamar Gelbman, in official capacity as Treasurer
Itamar Gelbman for Congress
P.O. Box 832
Joshua, TX 76058

C00495937
AF#: 2526

Dear Mr. Gelbman:

On July 24, 2012, the Commission received your written response ("challenge") which is being reviewed by the Office of Administrative Review. If you have any questions regarding your challenge, please contact this Office on our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

Sincerely,

A handwritten signature in cursive script, reading "Dayna C. Brown".

Dayna C. Brown
Reviewing Officer
Office of Administrative Review

12092681546

Date: July 24, 2012

**REFERRAL TO OFFICE OF ADMINISTRATIVE REVIEW
CHALLENGE RECEIVED**

AF#: 2526

Committee Name: Itamar Gelbman for Congress

Committee ID#: C00495937

Committee Address (if different than in RTB letter): N/A

Treasurer Name (if different than in RTB finding): N/A

Attachments:

Copy of RTB Circulation Report, dated June 22, 2012 and RTB Certification, dated June 26, 2012 (Y/N): Y

Attachment #: 1

Proof of Delivery (to be forwarded at later date if not yet received) (Y/N): Y

Attachment #: 2

Other Relevant Telecoms (Y/N): N

Attachment #: N/A

Original Correspondence Received by RAD in Response to RTB Letter (Y/N): N

Attachment #: N/A

RAD Staff Declaration (Y/N): Y

-2012 Primary Election Report Prior Notice, dated April 23, 2012.

-Non-Filer Letter, dated May 18, 2012.

-MS-P Letter, dated May 29, 2012.

-RTB Letter, dated June 26, 2012.

Attachment #: 4

Other RAD Information: (Y/N): Y

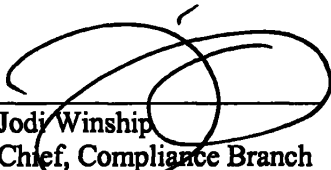
-Memo to File, dated July 2, 2012

Attachment#: 5

12092681547

DECLARATION OF JODI WINSHIP

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Itamar Gelbman for Congress:
 - A) Prior Notice, dated April 23, 2012, referencing the 2012 Pre-Primary Report (sent via electronic mail to: info@gelbmanforcongress.com);
 - B) Non-Filer Letter, dated May 18, 2012, referencing the 2012 Pre-Primary Report;
 - C) MS-P Letter, dated May 29, 2012, referencing the 2012 12 Day Pre-Primary Report (sent via electronic mail to: info@gelbmanforcongress.com);
 - D) Reason-to-Believe Letter, dated June 26, 2012 referencing the 2012 12 Day Pre-Primary Report.
3. I hereby certify that I have searched the Commission's public records and find that Itamar Gelbman for Congress filed the 2012 Pre-Primary Report with the Commission on July 4, 2012.
4. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 24th day of July, 2012.



Jodi Winship
Chief, Compliance Branch
Reports Analysis Division
Federal Election Commission



PRIMARY ELECTION

REPORT NOTICE

FEDERAL ELECTION COMMISSION

TEXAS

April 23, 2012

POLITICAL COMMITTEES INVOLVED IN THE PRIMARY (05/29/12):

| REPORT | REPORTING PERIOD ¹ | REG./CERT. & OVERNIGHT MAILING DEADLINE | FILING DEADLINE |
|-----------------|-------------------------------|--|-----------------------|
| Pre-Primary | 04/01/12 - 05/09/12 | 05/14/12 | 05/17/12 |
| 48-Hour Notices | 05/10/12 - 05/26/12 | – TX primary candidates only – see filing info – | |
| July Quarterly | 05/10/12 - 06/30/12 | 07/15/12 | 07/15/12 ² |

FOR POLITICAL COMMITTEES INVOLVED IN BOTH THE PRIMARY (05/29/12) AND RUNOFF (07/31/12), IF HELD:

| REPORT | REPORTING PERIOD ¹ | REG./CERT. & OVERNIGHT MAILING DEADLINE | FILING DEADLINE |
|-------------------|-------------------------------|--|-----------------------|
| Pre-Primary | 04/01/12 - 05/09/12 | 05/14/12 | 05/17/12 |
| 48-Hour Notices | 05/10/12 - 05/26/12 | – TX primary candidates only – see filing info – | |
| July Quarterly | 05/10/12 - 06/30/12 | 07/15/12 | 07/15/12 ² |
| Pre-Runoff | 07/01/12 - 07/11/12 | 07/16/12 | 07/19/12 |
| 48-Hour Notices | 07/12/12 - 07/28/12 | – TX runoff candidates only – see filing info – | |
| October Quarterly | 07/12/12 - 09/30/12 | 10/15/12 | 10/15/12 |

WHO MUST FILE

The following committees must file the Texas Pre-Primary/Runoff Report(s):

- **Principal campaign committees** of congressional candidates (including unopposed candidates and candidates whose names do not appear on the ballot) who seek election in the primary election must file the above reports and notices.
- **PACs and party committees** filing on a quarterly basis in 2012 are subject to pre-election reporting if they make previously undisclosed contributions or expenditures (including independent expenditures) in connection with an election by the close of books of the applicable report(s).

Supplemental Filing Information is available:

- **Congressional Committees**
- **Parties and PACs**

Additional information for Texas Campaign Committees – click here

¹ These dates indicate the beginning and end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered up through the close of books for the first report due.

² Notice that this filing deadline falls on a weekend or federal holiday. Filing deadlines are not extended when they fall on nonworking days. Accordingly, reports filed by methods other than registered, certified or overnight mail, or electronically, must be received before the Commission's (or the Secretary of the Senate's) close of business on the last business day before the deadline.

2012 SUPPLEMENTAL FILING INFORMATION CONGRESSIONAL COMMITTEES

PLEASE NOTE: The Commission provides reminders of upcoming filing dates as a courtesy to help committees comply with the filing deadlines set forth in the Act and Commission regulations. Committee treasurers must comply with all applicable filing deadlines established by law, and the lack of prior notice does not constitute an excuse for failing to comply with any filing deadline.

WHO MUST FILE

Principal campaign committees of congressional candidates¹ (including unopposed candidates and candidates whose names do not appear on the ballot) must file Quarterly Reports in 2012.²

Campaigns that raise or spend more than \$5,000 for the 2012 election cycle (and thus trigger registration and reporting requirements) must file quarterly reports throughout 2012, even if the candidate plans to retire, withdraws from the race prior to the primary election, loses the primary or drops out of the race prior to the general election. See 11 CFR 104.5(a)(2).

Before a committee can stop filing with the FEC, it must file a termination report with the Commission. See 11 CFR 102.3. Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

METHODS OF FILING REPORTS

Electronic Filing

Reports filed electronically must be received and validated by the Commission by 11:59 p.m. Eastern Time on the filing deadline. See 11 CFR 104.5(e). See also 11 CFR 104.18 and 100.19.

- Web Page: [Electronic Filing Page](#)
- [*Candidate Guide for Congressional Candidates and Committees \(Candidate Guide\)*, pp. 83-86 \[PDF\]](#)

Paper Filing - Meeting the Filing Deadline

Paper Report filing options -- Registered, Certified or Overnight or First Class Mail.

See 11 CFR 104.5(e). See also 11 CFR 100.19.

- Web Page: [Link to Paper Forms](#) (for downloading and printing)
- [*Candidate Guide*, p. 82 \[PDF\]](#)

¹ Generally, an individual becomes a candidate for federal office (and thus triggers registration and reporting obligations) when his or her campaign exceeds \$5,000 in either contributions or expenditures. If the campaign has not crossed the \$5,000 threshold, it is not required to file reports. See 11 CFR 100.3(a). See also 11 CFR 104.5(a).

² If a candidate has more than one authorized committee, the principal campaign committee files a consolidated report on [Form 3Z \[PDF\]](#). See 11 CFR 104.3(f).

PRE- AND POST-ELECTION REPORTS

The principal campaign committee of any candidate participating in a 2012 state primary, nominating convention or runoff election -- even if unopposed -- must also file a pre-election report 12 days prior to the primary, nominating convention or runoff. The principal campaign committee of a candidate who participates in the general election must file pre- and post-general election reports. See 11 CFR 104.5(a)(2).

- Web Page: 2012 Congressional Pre-Primary Reporting Dates
- The Record:
 - FEC Record Blog: Reporting
 - January 2012 issue [PDF]
- Candidate Guide, pp. 81-82 [PDF]

COMPLIANCE

Treasurer Responsibility

Committee Treasurers are responsible for both the timeliness and the accuracy of all reports. They may be subject to monetary penalties if reports are inaccurate or are not filed on time. See 11 CFR 104.14(d).

- Statement of Policy Regarding Treasurers Subject to Enforcement Proceedings [PDF]
- Candidate Guide, pp. 7-9 [PDF]

Administrative Fine Program

Political committees and their treasurers who fail to file their reports on time may be subject to civil money penalties up to \$17,600 (or more for repeat late- and non-filers).³ See generally, 11 CFR Part 111 Subpart B. See also 11 CFR 111.43.

- Web Page: Administrative Fine Program
- Candidate Guide, pp. 82-83 [PDF]

IMPORTANT FILING INFORMATION - PAPER FILERS

In response to the 2001 anthrax threat, the U.S. Postal Service is irradiating mail directed to many federal agencies, including the FEC and the Secretary of the Senate.⁴ This process has not only delayed mail delivery, it has also damaged and in some cases destroyed pieces of mail. As a result, committees that file reports with the FEC may want to consider submitting their reports by some means other than U.S. mail. Alternative methods include electronic filing, overnight mail or delivery service, and hand delivery.

³ Penalties for late- or non-filing of 48-hour notices are based on the amount of contributions not timely disclosed. As a result, these penalties may exceed \$17,600, even for first-time violations.

⁴ Senate committees should contact the Secretary of the Senate at (202) 224-0322 for more information on filing reports via US mail.

2012 REPORTING SCHEDULE

- Web Page: [2012 Reporting Dates Page](#)
- The Record:
 - [FEC Record Blog: Reporting](#)
 - [January 2012 issue](#) [PDF]
- [Candidate Guide, p. 83](#) [PDF]

DISCLOSURE OF LOBBYIST BUNDLING ACTIVITY

Campaign committees must file [FEC Form 3L](#) [PDF] if they receive two or more bundled contributions from lobbyists/registrants or lobbyist/registrant PACs that aggregate in excess of \$16,700 during the applicable reporting period (see [page 1 of this notice](#)). See 11 CFR 104.22 and 101.17(f).

- The Record: [March 2009 issue](#) [PDF]
- [Candidate Guide, Appendix F, pp. 155-161](#) [PDF]

SUPPLEMENTAL FILING INFORMATION TEXAS CAMPAIGN COMMITTEES ONLY

48 HOUR NOTICES ON CONTRIBUTIONS

The principal campaign committee must file notices if any authorized committees receive any contribution (including in-kind gifts or advances of goods or services; loans from the candidate or other non-bank sources; and guarantees or endorsements of bank loans to the candidate or committee) of \$1,000 or more per source, during the period of:

Primary: 05/10/12 - 05/26/12
Runoff: 07/12/12 - 07/28/12

The notices must reach the appropriate federal filing office within 48 hours of the committee's receipt of the contribution(s). Campaign committees that file electronically **MUST** submit their 48-hour notices electronically. See 11 CFR 104.5(f).

- Web Page: [Link to Paper Forms](#) (for downloading and printing)
- Web Page: [Link to Web Form 6](#) (for online submission)
- Form 6 Fax numbers
 - Senate campaigns (Secretary of the Senate): (202) 224-1851
 - House Campaigns (FEC): (202) 219-0174
- Campaign Guide: [Candidate, p. 81](#) [PDF].

FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1100

2012 SUPPLEMENTAL FILING INFORMATION PACs AND PARTY COMMITTEES

PLEASE NOTE: The Commission provides reminders of upcoming filing dates as a courtesy to help committees comply with the filing deadlines set forth in the Act and Commission regulations. Committee treasurers must comply with all applicable filing deadlines established by law, and the lack of prior notice does not constitute an excuse for failing to comply with any filing deadline.

WHO MUST FILE

All Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) must file either quarterly or monthly reports in 2012. See 11 CFR 104.5(c). Before a committee can stop filing with the FEC, it must file a termination report with the Commission. See 11 CFR 102.3. Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

METHODS OF FILING REPORTS

Electronic Filing

Reports filed electronically must be received and validated by the Commission by 11:59 p.m. Eastern Time on the filing deadline. See 11 CFR 104.5(e). See also 11 CFR 104.18 and 100.19.

- Web Page: Electronic Filing Page
- Campaign Guide: Nonconnected Committees (Nonconnected), pp. 51-53 [PDF]; Corporations and Labor Organizations (SSF), pp. 49-51 [PDF]; Political Party Committees (Party), pp. 69-71 [PDF].

Paper Filing – Meeting the Filing Deadline

Paper report filing options – Registered, Certified or Overnight or First Class Mail. See 11 CFR 104.5(e). See also 11 CFR 100.19.

- Web Page: Link to Paper Forms (for downloading and printing)
- Campaign Guide: Nonconnected, pp. 47-48 [PDF]; SSF, pp. 45-46 [PDF]; Party, p. 65 [PDF].

CHANGE IN FILING FREQUENCY

Committees able to change their reporting schedule (for example, from monthly to quarterly) who wish to do so must notify the Commission in writing and may change their filing frequency no more than once per calendar year. See 11 CFR 104.5(c).

- Web Page: Filing Frequency by Type of Committee
- Campaign Guide: Nonconnected, p. 51 [PDF]; SSF, p. 49 [PDF]; Party, p. 67 [PDF].

2012 REPORTING SCHEDULE

- Web Page: 2012 Reporting Dates Page
- The Record:
 - FEC Record Blog: Reporting
 - January 2012 issue [PDF]
- Campaign Guide: Nonconnected, pp. 49-51 [PDF]; SSF, pp. 46-48 [PDF]; Party, pp. 67-68 [PDF].

PRE-ELECTION REPORTING

Quarterly filing committees that make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See 11 CFR 104.5(c)(1)(ii).

- Web Page: 2012 Congressional Pre-Primary Reporting Dates Page
- The Record:
 - FEC Record Blog: Reporting
 - January 2012 issue [PDF]
- Campaign Guide: Nonconnected, pp. 49-51 [PDF]; SSF, pp. 46-48 [PDF]; Party, pp. 67-68 [PDF].

COMPLIANCE

Treasurer Responsibility

Committee treasurers are responsible for both the timeliness and the accuracy of all reports. They may be subject to monetary penalties if reports are inaccurate or are not filed on time. See 11 CFR 104.14(d).

- Statement of Policy Regarding Treasurers Subject to Enforcement Proceeding [PDF]
- Campaign Guide: Nonconnected, pp. 3-4 [PDF]; SSF, pp. 1-2 [PDF]; Party, pp. 6-7 [PDF].

Administrative Fine Program

Failure to file reports on time may be subject to civil money penalties up to \$17,600 (or more for repeat late- or non-filers). See 11 CFR 111.43(b). See generally, 11 CFR Part 111 Subpart B.

See also 11 CFR 111.43.

- Web Page: Administrative Fine Program Page
- Campaign Guide: Nonconnected, pp. 48-49 [PDF]; SSF, p. 46 [PDF]; Party, p. 66 [PDF].

DISCLOSURE OF LOBBYIST BUNDLING ACTIVITY

Party committees and Leadership PACs must file FEC Form 3L [PDF] if they receive two or more bundled contributions from lobbyists/registrants or lobbyist/registant PACs that aggregate in excess of \$16,700 during the applicable reporting period (see page 1 of this notice). See 11 CFR 104.22 and 11 CFR 110.17(f).

- The Record: March 2009 issue [PDF]

48- AND 24-HOUR REPORTS OF INDEPENDENT EXPENDITURES

Any PAC or Party Committee that makes independent expenditures in 2012 may have to disclose this activity within 48- or 24-hours based upon the date and amount of the expenditure.

See 11 CFR 104.4(b)(2) and (c). See generally, 11 CFR 104.4.

- Web Page: State-by-state chart of 2012 48- and 24-hour periods for independent expenditures
- Campaign Guide: Nonconnected, pp. 72-74 [PDF]; SSF, pp. 65-67 [PDF];
Party, pp. 87-89 [PDF].

These reports are not required when a PAC or Party Committee makes a contribution directly to a candidate.

FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1100



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 18, 2012

RQ-7

ITAMAR GELBMAN, TREASURER
ITAMAR GELBMAN FOR CONGRESS
PO BOX 832
JOSHUA, TX 76058

IDENTIFICATION NUMBER: C00495937

REFERENCE: PRE-PRIMARY REPORT 4/1/2012 - 5/9/2012

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED.

YOU WILL BE ALLOWED UNTIL 5:00 PM EST ON THE FOURTH (4th) BUSINESS DAY FROM THE DATE OF THIS NOTICE TO FILE THIS REPORT TO AVOID PUBLICATION. IF YOU HAVE ALREADY FILED THE REPORT BY EXPRESS, CERTIFIED OR REGISTERED MAIL OR ARE PLANNING TO FILE IT WITHIN FOUR (4) BUSINESS DAYS FROM THE DATE OF THIS NOTICE, PLEASE NOTIFY US IMMEDIATELY OF THE CERTIFIED, REGISTERED OR EXPRESS TRACKING NUMBER AND THE DATE THAT THE REPORT WAS SENT.

THE REPORT MUST BE FILED WITH THE FEDERAL ELECTION COMMISSION, 999 E STREET, N.W., WASHINGTON, D.C. 20463 FOR HOUSE CANDIDATES, OR THE SECRETARY OF THE SENATE, 232 HART SENATE OFFICE BUILDING, WASHINGTON, D.C. 20510 (MAILING ADDRESS: OFFICE OF PUBLIC RECORDS, P.O. BOX 77578, WASHINGTON, DC 20013-7578), FOR SENATE CANDIDATES. PLEASE NOTE THAT ELECTRONIC FILERS MUST SUBMIT THEIR REPORTS ELECTRONICALLY, AS PER 11 CFR §104.18. A COPY OF THE REPORT MUST ALSO BE FILED WITH THE SECRETARY OF STATE OR EQUIVALENT STATE OFFICER UNLESS THE STATE IS EXEMPT FROM THE FEDERAL REQUIREMENT TO RECEIVE AND MAINTAIN PAPER COPIES.

IN ADDITION, THE FAILURE TO TIMELY FILE THIS REPORT MAY RESULT IN CIVIL MONEY PENALTIES, AN AUDIT OR OTHER LEGAL ENFORCEMENT ACTION. THE CIVIL MONEY PENALTY CALCULATION FOR LATE REPORTS DOES NOT INCLUDE A GRACE PERIOD AND BEGINS ON THE DAY FOLLOWING THE DUE DATE FOR THE REPORT.

IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT CHRISTOPHER RITONIE IN THE REPORTS ANALYSIS DIVISION ON OUR TOLL FREE NUMBER (800)414-9530. OUR LOCAL NUMBER IS (202)694-1130.

SINCERELY,

Debbie Chacona

DEBBIE CHACONA
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION (RAD)

128382581555



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MS-P

May 29, 2012

ITAMAR GELBMAN, TREASURER
ITAMAR GELBMAN FOR CONGRESS
PO BOX 832
JOSHUA, TX 76058

IDENTIFICATION NUMBER: C00495937

REFERENCE: PRE-PRIMARY REPORT (04/01/2012 - 05/09/2012)

Dear Treasurer:

Your Committee has failed to file the above-referenced report in an electronic format. In accordance with 11 CFR § 104.18, you are required to file this report electronically. 11 CFR § 104.18 further states that reports filed on paper do not satisfy a political committee's filing obligation. Your reporting obligation will not be satisfied until you file the above-referenced report in an electronic format. You should also review 11 CFR § 104.18 for more information regarding your future reporting obligations.

It is important that you file this report in an electronic format immediately with the Federal Election Commission. The failure to timely file this report may result in civil money penalties, an audit or legal enforcement action. The civil money calculation for late reports does not include a grace period and begins on the day following the due date for the report.

If you have any questions, please contact David Garr in the Reports Analysis Division on the toll free number, (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division). His local number is (202) 694-1137.

Sincerely,

A handwritten signature in black ink, appearing to read "Jodi Winship".

Jodi Winship
Chief, Compliance Branch
Reports Analysis Division

12092681556



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2012 AUG 29 PM 4: 09

SENSITIVE

August 28, 2012

MEMORANDUM

To: The Commission

Through: Alec Palmer
Staff Director

From: Patricia C. Orrock *PCO*
Chief Compliance Officer

Dayna C. Brown *DCB*
Reviewing Officer
Office of Administrative Review

Subject: Reviewing Officer Recommendation in AF# 2526 – Itamar Gelbman for Congress and Itamar Gelbman, in his official capacity as Treasurer, (C00495937)

The attached Reviewing Officer Recommendation is being circulated on an informational basis. A copy was also sent to the respondents in accordance with 11 C.F.R. § 111.36(f). The respondents may file with the Commission Secretary a written response within 10 days of transmittal of the recommendation.

After the 10 day period, the Reviewing Officer Recommendation and the respondents' written response, if any, will be circulated to the Commission to make a final determination.

Attachment

12092681557



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 28, 2012

**REVIEWING OFFICER RECOMMENDATION
OFFICE OF ADMINISTRATIVE REVIEW ("OAR")**

AF# 2526 – Itamar Gelbman for Congress and Itamar Gelbman, in his official capacity as
Treasurer (C00495937)

Summary of Recommendation

Make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a \$1,400 civil money penalty.

Reason-to-Believe Background

On June 25, 2012, the Commission found reason to believe ("RTB") that the respondents violated 2 U.S.C. § 434(a) for failing to file the 12 Day Pre-Primary Report and made a preliminary determination that the civil money penalty was \$1,400, based on the schedule of penalties at 11 C.F.R. § 111.43. A letter, dated June 26, 2012, was mailed to the respondents' address of record by the Reports Analysis Division ("RAD") to notify them of the Commission's RTB finding and civil money penalty. On July 3, the letter was returned to the Commission because it was unclaimed at the respondents' post office box. Therefore, on July 3 a copy of the RTB letter was mailed to two alternate addresses provided by this Candidate, as well as successfully faxed.

Legal Requirements

The Federal Election Campaign Act requires that 12 day pre-election reports be filed by the treasurer of a principal campaign committee no later than the 12th day before any election in which the candidate is seeking election, or nomination for election. 2 U.S.C. § 434(a)(2)(A)(i) and 11 C.F.R. § 104.5(a)(2)(i). Political committees required to file reports with the Commission must file in an electronic format if they received or expect to receive contributions or made or expect to make expenditures in a calendar year aggregating in excess of \$50,000. A political committee shall have reason to expect to exceed this threshold for two calendar years following the calendar year in which the committee exceeds the threshold. Reports filed on paper do not satisfy a political committee's filing obligations. 2 U.S.C. § 434(a)(11) and 11 C.F.R. § 104.18(a). Reports electronically filed must be received and validated at or before 11:59 p.m., Eastern Standard/Daylight Time on the prescribed filing date to be timely filed. 11 C.F.R. §§ 100.19(c) and 104.5 (e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

Respondents' Challenge

On July 24, 2012, the Commission received the written response ("challenge") from Itamar Gelbman, Candidate and Treasurer, who requests forgiveness and waiver of the fine. The Treasurer states that he tried to file electronically numerous times in the 12 days prior to the Primary election, but was "denied." Shortly before the primary, he states he was contacted by a

Commission staff member who informed him that he missed the deadline, at which time he explained his unsuccessful efforts to file electronically. The staff person, he states, advised him to overnight a printout of the report, which he did thinking he had complied with the filing requirement. The Treasurer states that he was unaware that he should also file the report electronically until another staff person advised him of this on July 3. Following this July 3 conversation, he tried again and was successful in electronically filing the report.

The Treasurer states that this was an honest mistake and assures that it will not be repeated.

Analysis

The 2012 Texas 12 Day Pre-Primary Report was due on May 17, 2012. The respondents filed this report on July 4, 48 days late.

Although the Treasurer contends that shortly before the Primary election he was contacted by a Commission staff person who informed him that he failed to file the report, it is not the Commission's practice or policy to call committees when they miss filing deadlines. Instead, it is the practice of the Commission's Electronic Filing Office ("EFO") to send a courtesy non-filer email notification to those committees that file electronically. In this case, the EFO sent such a notification to "info@gelbmanforcongress.com" on May 18, 2012, the day after the report was due, alerting the respondents that they did not file the report.

According to the RAD telecoms (written records of telephone conversations), it was the Treasurer that first contacted the Reports Analyst regarding the report after receiving the non-filer email on May 18. The Treasurer indicated that he thought he filed the report the prior night. The Analyst confirmed that the Commission had not received the report and informed him that he would receive an immediate email confirmation when the report was successfully filed. Having previously electronically filed the Committee's 2011 October Quarterly and Year End Reports as well as the 2012 April Quarterly Report, according to the EFO, the Treasurer was sent an email confirmation after successfully filing each of the respective reports. The emails were sent to "info@gelbmanforcongress.com," the same address at which the non-filer email notification was successfully received by the Treasurer.

The Treasurer informed the Analyst in their May 18 conversation that he would file the report in about two hours when he had internet access, however, Commission records indicate that the report was not electronically filed that day. Instead, the Treasurer mailed the report via Express Mail the following day and it was received at the Commission on May 21. Although the Treasurer indicates that he was advised by a Commission staff person to file in this manner, there are no records to this effect. Conversely, because the respondents were required to file electronically pursuant to 11 C.F.R. § 104.18, RAD emailed a failure to file in an electronic format notification ("MS-P") to the respondents on May 29. The email was sent to "info@gelbmanforcongress.com," the email address provided on their Statement of Organization. The MS-P explained that their reporting obligation would not be satisfied until the 12 Day Pre-Primary Report was filed electronically; instructed them to immediately file the report electronically; and advised that the failure to file may result in civil money penalties. While the MS-P was sent to the same email address at which the Treasurer received the non-filer

notification just 11 days earlier, the Treasurer did not file the report electronically or contact RAD regarding the notice. The next communication regarding the report did not take place until the RAD Compliance Analyst called the Treasurer on July 3 regarding the unclaimed RTB letter that was mailed to the respondents' post office box. The report was electronically filed the following day, July 4.

Although the challenge contends that the Treasurer made several attempts to file the report prior to July 4, the Commission's Information Technology Division ("ITD") Manager confirms that there is no evidence of any problem with the FECFile software that would have prevented the respondents from filing the 12 Day Pre-Primary Report. Additionally, the ITD Manager affirms that the Treasurer did not contact the EFO for assistance with filing the report.

The administrative fine regulations specifically state that negligence and a committee's failure to use filing software properly are not reasonably unforeseen circumstances. 11 C.F.R. § 111.35(d). Their challenge fails to address any of the three valid grounds at 11 C.F.R. § 111.35(b). These are: (i) the RTB finding is based on factual errors; and/or (ii) the improper calculation of the civil money penalty; and/or (iii) they used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances. The other issues raised in the challenge, (the Treasurer's confidence of future compliance and providing the Commission with his personal cell phone number), also do not fall within the list of defenses enumerated at 11 C.F.R. § 111.35(b). Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$1,400.

OAR Recommendations

- (1) Adopt the Reviewing Officer recommendation for AF# 2526 involving Itamar Gelbman for Congress and Itamar Gelbman, in his official capacity as Treasurer, in making the final determination;
- (2) Make a final determination in AF# 2526 that Itamar Gelbman for Congress and Itamar Gelbman, in his official capacity as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$1,400; and
- (3) Send the appropriate letter.

Reviewing Officer: Dayna C. Brown

Attachments

Attachment 1 – Challenge Received from Respondents

Attachment 2 –

Attachment 3 – Declaration from RAD,

Attachment 4 – Declaration from OAR

DECLARATION OF DAYNA C. BROWN

1. I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
2. The 2012 12 Day Pre-Primary Report is due May 17, 2012. If electronically filed, it must be received and validated by the Commission at or before 11:59 p.m., Eastern Standard/Daylight Time on May 17, 2012 to be timely filed.
3. It is the practice of the Authorized Branch in the Commission's Report Analysis Division to document all calls to or from committees regarding a letter they received or any questions relating to the administrative fine regulations including due dates of reports and filing requirements.
4. I hereby certify that I have searched the Commission's public records and that the documents identified herein are the true and accurate copies of:
 - a) Page of the amended Statement of Organization filed by Itamar Gelbman for Congress and Itamar Gelbman, in his official capacity as Treasurer. According to the Commission's records, the document is dated September 13, 2011, was received October 2, 2011 and lists INFO@GELBMANFORCONGRESS.COM as the Committee's email address;
 - b) Page 1 of the Summary Page for the 2011 October Quarterly Report electronically filed by Itamar Gelbman for Congress and Itamar Gelbman, in his official capacity as Treasurer. According to the Commission's records, the report covers the period from July 1 through September 30, 2011, and was received on October 6, 2011;
 - c) Page 1 of the Summary Page for the 2011 Year End Report electronically filed by Itamar Gelbman for Congress and Itamar Gelbman, in his official capacity as Treasurer. According to the Commission's records, the report covers the period of October 1 through December 31, 2011, and was received on January 13, 2012;
 - d) Page 1 of the Summary Page for the 2012 April Quarterly Report electronically filed by Itamar Gelbman for Congress and Itamar Gelbman, in his official capacity as Treasurer. According to the Commission's records, the report covers the period of January 1 through March 31, 2012, and was received on April 11, 2012;
 - e) Page 1 of the Summary Page and the Envelope Replacement Page for the paper copy of the report sent via Express Mail by Itamar Gelbman for Congress and Itamar Gelbman, in his official capacity as Treasurer. According to the Commission's records, the paper copy covers the period from April 1 through May 9, 2012, was postmarked on May 19, 2012, and was received on May 21, 2012;
 - f) Page 1 of the Summary Page for the 2012 12 Day Pre-Primary Report electronically filed by Itamar Gelbman for Congress and Itamar Gelbman, in

12092681561

his official capacity as Treasurer. According to the Commission's records, the report covers the period from April 1 through May 9, 2012 and was received on July 4, 2012.

5. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington on the 28th of August, 2012.



Dayna C. Brown
Reviewing Officer
Office of Administrative Review
Federal Election Commission

12092681562

FEC
FORM 1

STATEMENT OF
ORGANIZATION

RECEIVED

2011 OCT -2 AM 10:10

FEC MONITOR

1. NAME OF
COMMITTEE (In full)

(Check if name
is changed)

Example: If typing, type
over the lines.

12FE4M5

ITAMAR GELBMAN FOR CONGRESS

ADDRESS (number and street)

PO BOX 232

(Check if address
is changed)

JOSHUA

TX

76052

CITY

STATE

ZIP CODE

COMMITTEE'S E-MAIL ADDRESS (Please provide only one e-mail address)

(Check if address
is changed)

INFO@GELBMANFORCONGRESS.COM

COMMITTEE'S WEB PAGE ADDRESS (URL)

(Check if address
is changed)

HTTP://WWW.GELBMANFORCONGRESS.COM

2. DATE

09/13/2011

3. FEC IDENTIFICATION NUMBER

C00495937

4. IS THIS STATEMENT

NEW (N)

OR

X

AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

ITAMAR GELBMAN

Signature of Treasurer



Date

09/13/2011

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office
Use
Only

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-694-1100

FEC FORM 1
(Revised 02/2009)

**FEC
FORM 3****REPORT OF RECEIPTS
AND DISBURSEMENTS**
For An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

ITAMAR GELBMAN FOR CONGRESS

ADDRESS (number and street) ▼

PO BOX 832

Check if different
than previously
reported. (ACC)

JOSHUA

TX

76058

2. FEC IDENTIFICATION NUMBER ▼

C C00495937

CITY ▲

STATE ▲

ZIP CODE ▲

STATE ▼ DISTRICT

3. IS THIS REPORT X NEW (N) OR AMENDED (A)

TX 25

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

X October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

in the
State of

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

in the
State of

5. Covering Period

07 01 2011

through

09 30 2011

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Itamar Gelbman

Signature of Treasurer

Itamar Gelbman

[Electronically Filed]

Date

10 02 2011

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office
Use
Only**FEC FORM 3**
(Revised 02/2003)

Image# 12950085041

**FEC
FORM 3****REPORT OF RECEIPTS
AND DISBURSEMENTS**

For An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

ITAMAR GELBMAN FOR CONGRESS

ADDRESS (number and street) ▼

PO BOX 832

Check if different
than previously
reported. (ACC)

JOSHUA

TX

76058

2. FEC IDENTIFICATION NUMBER ▼

C C00495937

CITY ▲

STATE ▲

ZIP CODE ▲

STATE ▼ DISTRICT

3. IS THIS
REPORT

X

NEW
(N)

OR

AMENDED
(A)

TX

25

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

X January 31 Year-End Report (YE)

Termination Report (TER)

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Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

in the
State of

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

in the
State of

5. Covering Period

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through

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2011

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Itamar Gelbman

Signature of Treasurer

Itamar Gelbman

[Electronically Filed]

Date

01

07

2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office
Use
Only**FEC FORM 3**
(Revised 02/2003)

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12092681565

**FEC
FORM 3****REPORT OF RECEIPTS
AND DISBURSEMENTS**
For An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

ITAMAR GELBMAN FOR CONGRESS

ADDRESS (number and street) ▼

PO BOX 832

Check if different
than previously
reported. (ACC)

JOSHUA

TX

76058

2. FEC IDENTIFICATION NUMBER ▼

C C00495937

CITY ▲

STATE ▲

ZIP CODE ▲

STATE ▼ DISTRICT

3. IS THIS
REPORT

X

NEW
(N)

OR

AMENDED
(A)

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4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

X

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

in the
State of

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

in the
State of

5. Covering Period

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through

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2012

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Itamar Gelbman

Signature of Treasurer

Itamar Gelbman

[Electronically Filed]

Date

04 05 2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office
Use
Only**FEC FORM 3**
(Revised 02/2003)

FEC
FORM 3REPORT OF RECEIPTS
AND DISBURSEMENTS

For An Authorized Committee

RECEIVED

2012 MAY 2 10:45 AM

1. NAME OF
COMMITTEE (In full)

TYPE OR PRINT ▼

Example: If typing, type
over the lines.12554M5
FEC MAIL CENTER

ITAMAR GELBMAN FOR CONGRESS

ADDRESS (number and street)

PO BOX 832

Check if different
than previously
reported. (ACC)

JOSHUA

TX

78058

2. FEC IDENTIFICATION NUMBER ▼

C

C00485837

CITY ▲

STATE ▲

ZIP CODE ▲

STATE ▼ DISTRICT

3. IS THIS
REPORT☒ NEW
(N)

OR

☐ AMENDED
(A)

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4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

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Primary (12P)

General (12G)

Runoff (12R)

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Convention (12C)

Special (12S)

Election on

05

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2012

In the
State of

TX

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

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In the
State of

TX

5. Covering Period

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I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Itamar Gelbman

Signature of Treasurer

Itamar Gelbman

Date

05


13

2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office
Use
OnlyFEC FORM 3
(Revised 02/2003)12092681567
12030812961

Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
The FEC added this page to the end of this filing to indicate how it was received.

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|--|---------------------------------|
| <input type="checkbox"/> Hand Delivered | Date of Receipt |
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| <input type="checkbox"/> USPS Registered/Certified | Postmarked (R/C) |
| <input type="checkbox"/> USPS Priority Mail | Postmarked |
| Delivery Confirmation™ or Signature Confirmation™ Label <input type="checkbox"/> | |
| <input checked="" type="checkbox"/> USPS Express Mail | Postmarked 5/19/12 |
| <input type="checkbox"/> Postmark Illegible | |
| <input type="checkbox"/> No Postmark | |
| <input type="checkbox"/> Overnight Delivery Service (Specify): | Shipping Date |
| Next Business Day Delivery <input type="checkbox"/> | |
| <input type="checkbox"/> Received from House Records & Registration Office | Date of Receipt |
| <input type="checkbox"/> Received from Senate Public Records Office | Date of Receipt |
| <input type="checkbox"/> Received from Electronic Filing Office | Date of Receipt |
| <input type="checkbox"/> Other (Specify): | Date of Receipt or Postmarked |
|  PREPARER (3/2005) | 5/21/12 DATE PREPARED |

12092681568

12030812974

**FEC
FORM 3****REPORT OF RECEIPTS
AND DISBURSEMENTS**
For An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

ITAMAR GELBMAN FOR CONGRESS

ADDRESS (number and street) ▼

PO BOX 832

Check if different
than previously
reported. (ACC)

JOSHUA

TX

76058

2. FEC IDENTIFICATION NUMBER ▼

C C00495937

CITY ▲

STATE ▲

ZIP CODE ▲

STATE ▼ DISTRICT

3. IS THIS
REPORT

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NEW
(N)

OR

AMENDED
(A)

TX

25

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

X

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

M M D D Y Y Y Y
05 29 2012

in the State of TX

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

M M D D Y Y Y Y

in the State of

5. Covering Period

M M D D Y Y Y Y
04 01 2012

through

M M D D Y Y Y Y
05 09 2012

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Itamar Gelbman

Signature of Treasurer Itamar Gelbman

[Electronically Filed]

Date

M M D D Y Y Y Y
05 13 2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office
Use
Only**FEC FORM 3**
(Revised 02/2003)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

VIA OVERNIGHT DELIVERY

August 29, 2012

Itamar Gelbman, in official capacity as Treasurer
Itamar Gelbman for Congress
P.O. Box 832
Joshua, TX 76058

C00495937
AF# 2526

Dear Mr. Gelbman:

On June 25, 2012, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Itamar Gelbman for Congress and you, in your official capacity as Treasurer ("respondents"), violated 2 U.S.C. § 434(a) for failing to file the 2012 12 Day Pre-Primary Report. The Commission also made a preliminary determination that the civil money penalty was \$1,400 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing the written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination in this matter. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 999 E Street, NW, Washington, DC 20463. As a result of the anthrax threat in the Washington, DC area, US Postal Service mail delivery to federal agencies, including the Commission, has been interrupted. Until regular mail delivery resumes, you may also file your written response with the Commission Secretary via facsimile (202-208-3333) or by courier at the same address (if you use an overnight delivery service, please use zip code 20004 instead of zip code 20463). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1660 if you have any questions.

Sincerely,

Dayna C. Brown
Reviewing Officer
Office of Administrative Review

Attachment

12092681570

VIA USPS Certified Mail 7007 2560 0001 7518 2474 and facsimile (202-208-3333)

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

Sep 7th, 2012

2012 SEP 17 A 10:44

Commission Secretary

999 E Street NW
Washington, DC 20463

RE: **AF #2526**

Dear Sir/Mam,

I have received your letter dated August 29, 2012.

I am writing this letter to you to express my feelings and request for your compassion understanding.

I was a candidate for U.S. Congressional district 6 from the state of TX.

During the primary election (May 2012) I have failed to report the 12 day Pre-Primary report by the FEC deadline.

During this period I was on the road a lot trying to cast votes, district 6 (the district I was running for) is a very large district and very rural which made it hard to have internet access (conversations between myself and FEC representative on May 18th, 2012 indicates that I have communicated this issue with the FEC).

During that period I have tried to electronically submit the committee file but with no luck, I am not exactly sure for the reasons.

Even according to your finding you can see that this was an honest mistake and it wasn't a repeated issue or a malicious attitude from my side.

As soon as I received the non-filer notification I have contacted the FEC representative to try to solve this mistake, even from your finding it clearly shows that I respect the FEC rules and regulations and I have tried to comply with them as a priority).

In your finding you mentioned that I haven't submitted the file electronically but I did submit it as a hard copy via Express Mail.

By filing the committee report in a hard copy version by Express Mail I was under the impression that I have complied with all the laws and regulation of the FEC.

Only on July 3rd when I was contacted by the FEC representative I realized that I didn't comply with all of the FEC rules. I immediately left work and everything I had to do and to obey the FEC rules and regulation and electronically submit the committee file, even by your finding it states that the file was accepted on July 4th.

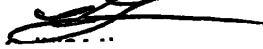
12092681571

I am contacting you today to ask for your compassion, the slowdown in the economy hurt me and my family financially, I am a law abiding citizen (I never even got a traffic ticket) and with all my heart I can say that this was just an honest mistake.

It's important to mention that this was the first and only time I didn't comply with the FEC and I am assuring you it was the last time.

If you have any other questions and/or comments, please don't hesitate to contact me.

Itamar Gellman

A handwritten signature in black ink, appearing to read 'Itamar Gellman', with a horizontal line extending to the right.

12092681572



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2012 OCT -5 PM 1:27

October 5, 2012

MEMORANDUM

SENSITIVE

To: The Commission

Through: Alec Palmer
Staff Director

From: Patricia C. Orrork
Chief Compliance Officer

Dayna C. Brown
Reviewing Officer
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 2526 – Itamar Gelbman for Congress and Itamar Gelbman, in his official capacity as Treasurer (C00495937)

On June 25, 2012, the Commission found reason to believe ("RTB") that the respondents violated 2 U.S.C. § 434(a) for failing to file the 2012 12 Day Pre-Primary Report and also made a preliminary determination that the civil money penalty was \$1,400 based on the schedule of penalties at 11 C.F.R. § 111.43.

On July 24, 2012, the Commission received their written response ("challenge"). After reviewing the challenge, the Reviewing Officer's recommendation ("ROR") dated August 28, 2012, was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission make a final determination that they violated 2 U.S.C. § 434(a) and assess a \$1,400 civil money penalty because they submitted no evidence that a factual error was made in the RTB finding, that the penalty was miscalculated at RTB or that they used best efforts to file on time. 11 C.F.R. § 111.35(b).

Within 10 days of transmittal of the recommendation, they may file a written response with the Commission Secretary which may not raise any arguments not raised in their challenge or not directly responsive to the ROR. 11 C.F.R. § 111.36(f).

On September 17, 2012, the Commission received the written response from the Treasurer/Candidate which reiterates the main point raised in the challenge and addressed in the ROR: the Treasurer attempted to file the report electronically, but was not successful, and sent a

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hard copy of the report via Express Mail, believing he had complied with Commission laws and regulations.

The Treasurer explains that he contacted the Commission as soon as he received the non-filer notification, in order to resolve the matter. As discussed in the RQR, however, after receiving the May 18 non-filer email notification email, the Treasurer called his Reports Analyst that same day. After the Analyst confirmed that the report had not been filed, the Treasurer stated that he would file the report in two hours, once he had internet access. Instead of filing the report electronically, he sent a hard copy of the report via Express Mail the following day. In his most recent response, the Treasurer states that the district in which he was running is large and rural, which made it "hard to have internet access." The administrative fine regulations specifically state that committee computer, software or internet service provider failures are not circumstances that will be considered reasonably unforeseen and beyond the control of the respondents. 11 C.F.R. § 111.35(d).

The Treasurer's response also notes that he did not realize the hard copy report did not satisfy the filing requirement until he received a call from the Compliance Analyst on July 3, regarding the RTB letter. However, on May 29 RAD emailed a failure to file in an electronic format notification ("MS-P") to the respondents. This notice, sent to the same email address at which the Treasurer received the non-filer notification email just 11 days earlier, instructed them to immediately electronically file the report, as their filing obligation would not be satisfied until they did so. The report was electronically filed on July 4, 2012, 48 days late, and is considered not filed for purposes of the civil money penalty calculation. 11 C.F.R. § 111.43(e)(2).

The other issues raised (that the mistake was honest and without malice, and this is the first and only time they did not comply with the Commission) do not fall within the list of defenses enumerated at 11 C.F.R. § 111.35(b). These are: (i) the RTB finding is based on factual errors; and/or (ii) the improper calculation of the civil money penalty; and/or (iii) they used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances. Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$1,400.

OAR Recommendations

- (1) Adopt the Reviewing Officer recommendation for AF# 2526 involving Itamar Gelbman for Congress and Itamar Gelbman, in his official capacity as Treasurer, in making the final determination;
- (2) Make a final determination in AF# 2526 that Itamar Gelbman for Congress and Itamar Gelbman, in his official capacity as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$1,400; and
- (3) Send the appropriate letter.

Attachment

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Final Determination Recommendation in) AF 2526
Itamar Gelbman for Congress and Itamar)
Gelbman, in his official capacity as)
Treasurer (C00495937)

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election
Commission, do hereby certify that on October 17, 2012, the Commission
decided by a vote of 6-0 to take the following actions in AF# 2526:

1. Adopt the Reviewing Officer recommendation for AF# 2526
involving Itamar Gelbman for Congress and Itamar Gelbman, in
his official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 2526 that Itamar Gelbman for
Congress and Itamar Gelbman, in his official capacity as Treasurer,
violated 2 U.S.C. § 434(a) and assess a civil money penalty of
\$1,400.
3. Send the appropriate letter.

Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and
Weintraub voted affirmatively for the decision.

Attest:

October 18, 2012
Date

Shawn Woodhead Werth
Shawn Woodhead Werth
Secretary and Clerk of the Commission

12092681575



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 19, 2012

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Itamar Gelbman, in his official capacity as Treasurer
Itamar Gelbman for Congress
P.O. Box 832
Joshua, TX 76058

C00495937
AF# 2526

Dear Mr. Gelbman:

On June 25, 2012, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Itamar Gelbman for Congress and you, in your official capacity as Treasurer, violated 2 U.S.C. § 434(a) for failing to file the 2012 12 Day Pre-Primary Report. By letter dated June 26, 2012 the Commission sent you notification of the RTB finding that included a civil money penalty calculated at RTB of \$1,400 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On July 24, 2012, the Office of Administrative Review received your written response, challenging the RTB finding.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and the written response. Based on this review, the Reviewing Officer recommended that the Commission make a final determination that Itamar Gelbman for Congress and you, in your official capacity as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty in the amount of \$1,400 in accordance with 11 C.F.R. § 111.43. The basis for the Reviewing Officer's recommendation was included in the Final Determination Report, a copy of which was sent to you on August 29, 2012.

On September 17, 2012, the Commission received your response. On October 17, 2012, the Commission adopted the Reviewing Officer's recommendation and made a final determination that Itamar Gelbman for Congress and you, in your official capacity as Treasurer, violated 2 U.S.C. § 434(a) and assessed a civil money penalty of \$1,400. It is based on the same factors used to calculate the civil money penalty at RTB. A copy of the final determination recommendation is attached.

If You Choose to Appeal the Final Determination and/or Civil Money Penalty

If you choose to appeal the final determination, you should submit a written petition, within 30 days of receipt of this letter, to the district court of the United States for the district in

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which the committee or treasurer reside, or transact business, requesting that the final determination be modified or set aside. See 2 U.S.C. § 437g(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 2 U.S.C. § 437g. 11 C.F.R. § 111.38.

If You Choose Not to Pay the Civil Money Penalty and Not to Appeal

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 et seq. If you do not pay this debt within 30 days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within 5 days of the transfer to Treasury, Treasury will contact the debtor and request payment. Treasury currently charges a fee of 28% of the civil money penalty amount for its collection services, and 30% on debts over two years old. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA").

Actions which may be taken to enforce recovery of a delinquent debt by Treasury may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.

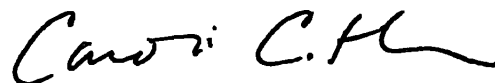
If You Choose To Pay the Civil Money Penalty

If you should decide to pay the civil money penalty, send the enclosed form and payment to the address on page 3 within 30 days of receipt of this letter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. The file will be made a part of the public record pursuant to 11 C.F.R. § 111.42(b). Although the file must be placed on the public record within 30 days from the date of the Commission's notification, this could occur at any time following certification of the Commission's vote.

If you have any questions regarding the payment of the civil money penalty, please contact Dayna Brown on our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

On behalf of the Commission,



Caroline C. Hunter
Chair

Attachment

ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 C.F.R. § 111.43, the civil money penalty is \$1,400 for 2012 12 Day Pre-Primary Report.

This penalty should be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission
PO Box 979058
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox
FEC # 979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

The form and payment are due within 30 days of receipt of this letter.

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Itamar Gelbman for Congress

FEC ID#: C00495937

AF#: 2526

PAYMENT AMOUNT DUE: \$1,400

FOR: Itamar Gelbman for Congress

FEC ID#: C00495937

AF#: 2526

PAYMENT AMOUNT DUE: \$1,400

3

QUALITY IS OUR PRIORITY FOR LOCKBOX 9058
SEQ# 001 \$ 0000140000 BA# 1 10-29-12 20 3



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| | | | |
|---|--------------------|----------------------------|-----|
| ITAMAR GELBMAN SHERMAN OAKS, CA 91403 | | 90-7162/3222 8853943732 | 145 |
| DATE <u>10/24/12</u> | | | |
| PAY TO THE ORDER OF <u>FEC</u> | \$ <u>1,400.00</u> | | |
| <u>One thousand four hundred and 00/100</u> | | DOLLARS | |
| CHASE JPMorgan Chase Bank, N.A. Washington National Branch 1000 17th Street, NW Washington, DC 20036 | | | |
| MEMO <u>AF 2526 C00495937</u> | | <u>[Signature]</u> | |



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 2526

DATE SCANNED

12/10/12

SCANNER NO.

2

SCAN OPERATOR

EEJ

12092681580